I have been a Quixtar IBO for the past ten years. It is the only opportunity I see as providing myself and my family an ongoing income based on my and my wife's efforts. I am impressed with the integrity of the Quixtar Corporation and it's parent company, Alticor and would not consider any other network marking organization in the same league.

All people we prospect are made fully aware that this is not a 'get rich quick' proposition. In fact I inform my prospects that the start up costs are so reasonable that(less than \$200) that is the good news and the bad news. Good news: not much at risk; bad news: not much at risk and that is why many people do not take the opportunity seriously enough.

The requirement for a 7-day waiting period would severely handicap my ability to grow my business and those people I am helping to grow their business. The most productive time for a new IBO is during his/her initial time in the business and that's when his prospects would also be most productive. In addition, if a new prospect was restricted from offering this opportunity to family and friend that may see the opportunity at the same time, they would be forced to delay the start of their respective businesses. A 7-day waiting period would dampen this excitement and reduce the new IBO's success for building a big business and a profitable one. You must remember that this business is a people helping people business and reducing the effectiveness of the mentor in the business would be very detrimental to the overall business.

The requirement to provide a litigation list for the past 10 years is not workable in any way. How many frivolous lawsuits are there? I have never been sued so why do I need to provide a list of suits for the Quixtar corp. Does Wendy's provide one for it's prospective franchisees and customers?

I am an independent Business Owner. If I were selling my entire business to a prospect a full disclosure of earnings would be reasonable. I am not selling my business. I am offering an opportunity for an individual/couple to build their own business larger than mine and I will help them do it. My earnings have no bearing on the success they can have in their business.

Our IBO's are encouraged to meet other members of their business team and other IBO's as soon as possible and that is why we have open opportunity and Business Development seminars regularly. That is where they get to meet and talk with others involved in the business. The requirement to provide a list of IBO references is unrealistic if it is not in our line of sponsorship. Those references might be able to recruit my prospect for their line of sponsorship.

These points are particularly onerous, cumbersome and not likely to accomplish the goals of what the Commission is trying to do. These particularly would only hinder the free opportunity provided by Quixtar to build a big business.

Thank you for the opportunity to comment.

Respectfully,

Jerry Lionetti